

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
(Baltimore Division)

IBN WILLIAMS,

Plaintiff,

v.

COPPIN STATE UNIVERSITY,

UNIVERSITY SYSTEM OF
MARYLAND,

STATE OF MARYLAND,

DEREK CARTER,

JUAN DIXON,

LUCIAN BROWNLEE,

Defendants.

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Civil Action No. _____

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(Removed from Circuit Court for
Baltimore City, Maryland, Case
No. 24-C-22-004662)

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NOTICE OF REMOVAL

Defendants Coppin State University (the “University”), the University System of Maryland (the “System”), the State of Maryland, Derek Carter, and Juan Dixon (collectively the “University Defendants”) by and through undersigned counsel, pursuant to 28 U.S.C. §§ 1331 and 1441, hereby remove to this Court a civil lawsuit filed by Plaintiff Ibn Williams (“Plaintiff”) in the Circuit Court for Baltimore City, Maryland, Case No. 24-C-22-004662. Without admitting any of the allegations of the complaint or amended complaint, Defendants’ grounds for removing this action are as follows:

1. On or about November 2, 2022, Plaintiff filed a lawsuit against Defendants in the Circuit Court for Baltimore City, Maryland, in which Plaintiff asserted multiple claims sounding

in Maryland tort and contract law. Because the complaint did not include any claims arising under federal law, the case was not removable at that point in time.

2. On May 18, 2023, the University Defendants filed a motion to dismiss based on governmental immunity and failure to state a claim.

3. On July 24, 2023, the circuit court granted the University Defendants' motion to dismiss and provided Plaintiff with the opportunity to file an amended complaint.

4. On August 23, 2023, Plaintiff served on the University Defendants an amended complaint that adds a claim for deliberate indifference under Title IX of the Education Amendments Act of 1972, 20 U.S.C. § 1681.

5. Under 28 U.S.C. § 1331, the district courts "have original jurisdiction of all civil actions arising under the Constitution, laws, or treaties of the United States." Therefore, this Court has original jurisdiction over the federal cause of action asserted in the amended complaint.

6. Because this Court has original jurisdiction under 28 U.S.C. §§ 1331, this action may be removed to this Court pursuant to 28 U.S.C. § 1441(a).

7. This Notice of Removal is timely under 28 U.S.C. § 1446(b)(3) because it is filed within 30 days after receipt by the University Defendants of the amended complaint from which it could first be ascertained that the case has become removable.

8. Defendant Lucian Brownlee consents to removal.

9. In accordance with 28 U.S.C. § 1446(a) and Local Rule 103.5(a), Defendants are attaching, as exhibits to this Notice of Removal, true and legible copies of all process, pleadings, documents and orders which have been served on Defendants. Specifically, Defendants are attaching the following:

Exhibit 1 – Docket Entries - Circuit Court for Baltimore City
Exhibit 2 – Civil Case Information Report

Exhibit 3 – Writ of Summons - University System of Maryland
Exhibit 4 – Writ of Summons - University System of Maryland
Exhibit 5 – Complaint
Exhibit 6 – Line
Exhibit 7 – Consent Motion to Extend Time to Respond
Exhibit 8 – Order
Exhibit 9 – Defendants’ Consent Motion for Extension of Time to File Responsive Pleading
Exhibit 10 – Kayann S. Chamber’s Withdrawal of Appearance
Exhibit 11 – Order
Exhibit 12 – Order for Mediation
Exhibit 13 – Notification to Parties of Contemplated Dismissal
Exhibit 14 – Notice of Hearing / Trial
Exhibit 15 – Defendant’s Motion to Vacate Order for Mediation
Exhibit 16 – Order
Exhibit 17– University Defendants’ Motion to Dismiss and Memorandum of Law in Support of The University Defendants’ Motion to Dismiss
Exhibit 18– University Defendants’ Motion to Stay Discovery Pending Disposition of Their Motion to Dismiss
Exhibit 19 – Order
Exhibit 20 – Order
Exhibit 21 – Plaintiff’s Consent Motion to Extend the Plaintiff’s Deadline to Respond to Defendant’s Motion to Dismiss
Exhibit 22 – Order
Exhibit 23 – Plaintiff IBN Williams’ Memorandum in Opposition to University Defendants’ Motion to Dismiss and Request for Hearing
Exhibit 24 – Order
Exhibit 25 – Notice of Motion Hearing
Exhibit 26 – Entry of Appearance – Thomas W. Kelly, Esq.
Exhibit 27 – Zoom Hearing Notice
Exhibit 28 – Reply Memorandum of Law in Support of The University Defendant’s Motion to Dismiss
Exhibit 29 – Order
Exhibit 30 – Amended Complaint – Redline
Exhibit 31 – Amended Complaint
Exhibit 32 – Notice of Appearance – Ann M. Sheridan
Exhibit 33 – Defendants’ Consent Motion for Extension of Time to File Responsive Pleading
Exhibit 34 - Order
Exhibit 35 – Defendants’ Consent Motion for Extension of Time to File Responsive Pleading
Exhibit 36 – Defendant’s Answer to Amended Complaint
Exhibit 37 – University Defendants’ Motion to Dismiss Amended Complaint

10. A copy of this Notice of Removal will be served upon Plaintiff and Defendant Lucian Brownlee and filed with the Clerk of the Court for the Circuit Court for Baltimore City, Maryland promptly.

WHEREFORE, Defendants move that the lawsuit now pending against them in the Circuit Court for Baltimore City, Maryland (Case No. 24-C-22-004662) be removed therefrom to this Court.

Respectfully submitted,

ANTHONY G. BROWN
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/s/ Ann M. Sheridan

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September 22, 2023

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